

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

IN THE MATTER OF THE SEIZURE OF  
FUNDS NOT TO EXCEED \$739,344.13  
FROM BANK OF AMERICA BUSINESS  
CHECKING ACCOUNTS [REDACTED] 6422,  
[REDACTED] 1205, [REDACTED] 15409,  
[REDACTED] 6435, [REDACTED] 9802,  
[REDACTED] 8371, AND [REDACTED] 6132

Case No. 4:22CR580

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEIZURE WARRANT**

I, Joseph Hamski, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and as such I am an "investigative or law enforcement officer" of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am empowered by law to conduct investigations and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I have been employed as a Special Agent (SA) of the FBI since April 2008. I have been assigned investigative responsibility in the areas of complex financial crimes and money laundering in the Columbia Division, Charleston Resident Agency, of the FBI. Prior to my appointment as a Special Agent, I was employed as a Military Police Officer in the United States Army for approximately four (4) years. I currently serve as a Special Agent on the Palmetto

Financial Crimes Task Force made up of FBI, United States Postal Inspection Service and South Carolina Law Enforcement Division (SLED) personnel.

3. I have received specialized training and/or on-the-job training on white collar crime matters and previously investigated violations of federal law to include money laundering, bank/mail/wire and securities fraud. I have participated in investigations utilizing Title III's as the Affiant for Order(s) and as a monitor, conducted and participated in physical and electronic surveillance, executed search warrants, debriefed informants, and conducted consensual recordings for financial crimes and/or public corruption investigations. I have also received formal education and training in the concepts of probable cause and reasonableness for searches and seizures that conform with the application of the 4<sup>th</sup> amendment of the U.S. Constitution. I have received this training at the FBI Academy and other law enforcement learning centers.

4. I make this affidavit in support of an application for a federal seizure warrant authorizing agents of FBI who are involved in the investigation to seize the below described property, not to exceed \$739,344.13, from the following bank accounts:

- a. Bank of America checking account number [REDACTED] 6422 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari (also referred to herein as "**6422 Account**").
- b. Bank of America business economy checking account number [REDACTED] 1205 in the name of Rajani Tigers Ferrante DBA Preservations Station Preserve (also referred to herein as "**1205 Account**").
- c. Bank of America business checking account number [REDACTED] 5409 in the name of Preservations Station; Bhagavan Antle; T.I.G.E.R.S (also referred to herein as "**5409 Account**").
- d. Bank of America business checking account number [REDACTED] 6435 in the name of TIGERS, LLC DBA Tigers preservation Station (also referred to herein as "**6435 Account**").

- e. Bank of America business checking account number [REDACTED] 8371 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari (also referred to herein as "**8371 Account**").
- f. Bank of America business checking account number [REDACTED] 9802 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari (also referred to herein as "**9802 Account**").
- g. Bank of America business checking account number [REDACTED] 6132 in the name of Bhagavan Antle Sole Prop DBA Preservation Station T.I.G.E.R.S (also referred to herein as "**6132 Account**").

5. The accounts identified in paragraph 4(a) through 4(g) are referred to herein as

**"Subject Accounts".**

6. Your Affiant has probable cause to believe that the funds in the **Subject Accounts** were used in and/or are unlawful proceeds of violations of Title 18 U.S.C. § 1956(a)(3) (Laundering of Monetary Instruments) and Title 18 U.S.C. § 1956(h) (Money Laundering Conspiracy) and are thereby subject to civil and criminal forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(A), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). The funds described herein are also thereby subject to civil and criminal seizure pursuant to Title 18 U.S.C. § 981(b) and Title 21 U.S.C. § 853(e) and (f) by Title 18 U.S.C. § 982(b)(1). Pursuant to Title 18 U.S.C. § 984(a)(1) and with respect to funds deposited in a financial institution, it is not necessary for the Government "to identify the specific property involved in the offense that is the basis for the forfeiture" so long as the forfeiture action is commenced within one year of the offense.

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PROPERTY SUBJECT TO SEIZURE**

8. Bank of America is a federally insured financial institution headquartered in Charlotte, North Carolina.

9. According to records provided by Bank of America via a grand jury subpoena the following accounts are registered to Mahamayavi Bhagavan Antle a/k/a Doc Antle as the sole proprietor and/or signature authority of the accounts, and primarily controlled by Antle:

- a. Bank of America checking account number [REDACTED] 6422 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari was opened and/or updated on August 7, 2019. Antle is the sole proprietor and account owner. Moksha Bybee, China York, Tilakam Watterson and Rajani Ferrante are listed as signature authorities for the said account.
- b. Bank of America business economy checking account number [REDACTED] 1205 in the name of Rajani Tigers Ferrante DBA Preservations Station Preserve was opened on February 3, 2006. Rajani Ferrante is the sole proprietor for the said account. Doc Antle and Kheira Knoop are listed as signature authorities for the said account.
- c. Bank of America business checking account number [REDACTED] 5409 in the name of Preservations Station; Bhagavan Antle; T.I.G.E.R.S was opened on February 12, 2018. Antle is the sole proprietor and account owner. Moksha Bybee, China York, Tilakam Watterson and Rajani Ferrante are listed as signature authorities for the said account.
- d. Bank of America business checking account number [REDACTED] 6435 in the name of TIGERS, LLC DBA Tigers preservation Station opened and/or

updated on August 7, 2018. Antle is the sole proprietor and account owner.

Moksha Bybee, China York, Tilakam Watterson and Rajani Ferrante are listed as signature authorities for the said account.

- e. Bank of America business checking account number [REDACTED] 8371 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari was opened and/or updated on April 13, 2021. Antle is the sole proprietor and account owner.
- f. Bank of America business checking account number [REDACTED] 9802 in the name of South Carolina Conservation Farm DBA Myrtle Beach Safari was opened and/or updated on July 7, 2020. Antle is the sole proprietor and account owner.
- g. Bank of America business checking account number [REDACTED] 6132 in the name of Bhagavan Antle Sole Prop DBA Preservation Station T.I.G.E.R.S was opened and/or updated on February 12, 2018. Antle is the sole proprietor and account owner. Moksha Bybee, China York, Tilakam Watterson and Rajani Ferrante are listed as signature authorities for the said account.

10. As will be described in more detail below, \$739,344.13 that was subject to seizure from a previously executed federal warrant was removed from the **6422 Account** and, as a result, the Government seeks an additional seizure warrant to seize funds from the **Subject Accounts** not to exceed \$739,344.13.

## **PROBABLE CAUSE**

11. On October 3, 2019, a confidential informant (CI) with the FBI (hereinafter referred to as “CI1”), advised that a member of the Myrtle Beach business community known to launder funds (hereinafter “Myrtle Beach Launderer”) requested CI1’s assistance with a \$200,000 check cashing venture. Myrtle Beach Launderer asked CI1 to assist an individual named Doc Antle (hereinafter referred to as “Antle”) by providing cash to him in exchange for a check greater than the value of the cash to be received. This is a hallmark of money laundering and other illicit financial activity, as the person writing the check actually loses money for the benefit of having liquid cash that cannot be traced. Myrtle Beach Launderer provided CI1 with Antle’s phone number, identified as 843-254-7507, and told him/her to meet with Antle at 851 Folly Ranch Road, Myrtle Beach, South Carolina 29588.

12. Antle is a resident of Myrtle Beach, South Carolina. He is the owner and operator of The Institute for Greatly Endangered and Rare Species (T.I.G.E.R.S), also known as the Myrtle Beach Safari. The Myrtle Beach Safari is a 50-acre wildlife tropical preserve located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. The Myrtle Beach Safari offers tours and private encounters with exotic wildlife.

13. CI1 provided the known details from Myrtle Beach Launderer to an independent CI with Homeland Security Investigations (HSI) (hereinafter referred to as “CI2”). CI1 asked CI2 to meet Antle at the Myrtle Beach Safari.

14. CI1 and CI2 were unaware of each other’s identity as CI’s for the federal law enforcement agencies listed above.

15. On October 3, 2019, at the direction of Special Agents with the FBI and HSI, CI2 traveled to the Myrtle Beach Safari to meet with Antle. Antle texted CI2 from the phone number

noted herein informing someone would meet him/her at the front entrance. A female, later identified to be Moksha Bybee, met with CI2 at the front gate. According to a news article online available via open source, Bybee is the general manager of the Myrtle Beach Safari. CI2 informed Bybee he/she could assist with the \$200,000 transaction, but it would be a 6% charge and could take up to six days to receive the cash. Bybee informed she would relay the information to Antle.

16. On the same date, Myrtle Beach Launderer telephonically contacted CI1. Myrtle Beach Launderer said Antle wanted a one-time delivery of the funds, that the money can be counted at the Myrtle Beach Safari and inquired if the fee can be reduced to 5%.

17. Later that day, CI1 received a text message from Antle. The text message read the following: "We do not have enough time to wait. Thx for the offer of help. I had to do it today."

18. On approximately March 11, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Myrtle Beach Launderer at Myrtle Beach Launderer's office. In the recorded conversation, Myrtle Beach Launderer confirmed Antle had found another way to execute the \$200,000 (approximate) transaction detailed above from October 3, 2019 and advised he (Myrtle Beach Launderer) is actively engaged in money laundering with others. The following is a transcription of a segment of the recorded conversation:

CI1: The other thing I wanted to ask you that's more like you know, maybe you know somebody that can help me out. I'm trying to move... I remember a long time ago that you asked me before about that guy from the zoo?

MBL: Doc.

CI1: Yeah Doc, him. You asked me if I can find somebody to move him money and I am trying to do the same thing, do you know?

MBL: How much money you trying to move?

CI1: 200 to 300, cause I remember you said he got somebody else from that.

MBL: Yeah, he did, let's shut that door... Alright, so you got about 300,000 that you're just trying.

CI1: Yeah, maybe even more.

MBL: Talk to me, this is what I'm saying. I have people that do this.

19. On approximately July 30, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Myrtle Beach Launderer. CI1 met Myrtle Beach Launderer at his office and traveled with Myrtle Beach Launderer to the Myrtle Beach Safari located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. While enroute to meet Antle, Myrtle Beach Launderer told CI1 how Antle had previously asked him to assist with money laundering operations. The following is a transcription of a segment of the recorded conversation:

CI1: So, Doc wanted to do the 2 million cash with you and you didn't want to do it. That was to buy the monkeys?

MBL: Yeah, I couldn't do it. 2 million was too much for me

CI1: And they won't come and check if those monkeys

MBL: What was that?

CI1: Like if you buy those monkeys cash and?

MBL: Well he can't. The problem is he can't. He has to pay...He needed for me to launder two million dollars at one time. Like right now. I give you the 2 million, you give me it back. I can't do that. It would throw up every red flag in my book.

CI1: Yeah

MBL: I can do what we're doing. 50 grand a week. I can hide that all fucking day long. I can't do a million dollars a week.

CI1: Difficult.

20. Dallis, Antle and CI1 met at the Myrtle Beach Safari located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. Dallis introduced CI1 to Antle. Antle, CI1 and Dallis discussed a potential renovation and/or upgrade to one of buildings utilized to house animals at the Myrtle Beach Safari. Antle enlists CI1's assistance to perform the work.

21. On approximately August 10, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Myrtle Beach Launderer at Myrtle Beach Launderer's office. Myrtle Beach Launderer reiterated how Antle had

previously requested Myrtle Beach Launderer's assistance with washing money. The following is a transcription of a segment of the recorded conversation:

CI1: You trust him?  
MBL: Who? Doc?  
CI1: Yeah  
MBL: 100%. Why?  
CI1: Oh. Cuz he can make deals.  
MBL: Big deals. No, big deals. I mean, Doc. Millions and millions and millions.  
CI1: Yeah, cuz you say sometimes he wants cash. Right? Can get him cash.  
MBL: He wanted me to move cash, but he wanted to move millions. And I was like, I can't do that.

22. On approximately November 30, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle at the Myrtle Beach Safari located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. In the recorded conversation, CI1 asked Antle for assistance with laundering cash based on their previous interactions. Antle advised he knows someone who can assist. CI1 and Antle negotiated a potential washing fee. The following is a transcription of two segments of the recorded conversation:

CI1: The reason I wanted to come talk to you and I wanted it to be private cuz I wanted to ask you something. I don't know if you remember, a long time ago you called me and you wanted to do the deal with the 200 grand.  
Antle: Yeah, yeah, sure.  
CI1: You remember that? But I couldn't do it, so I got you the [person] but didn't end up doing well too. But right now, right now I've got about \$350,000 cash and I have another 300 coming, but it's cash and it's not drug money, so I don't give a shit. [Myrtle Beach Launderer] does it with me all the time.  
Antle: Yeah, yeah, [Myrtle Beach Launderer] told me.  
CI1: But I don't know if you want to do something? If you want to do something?  
Antle: Because you're ready to change some cash for check. I can write a check to . . . [your] company and it just goes in as though I bought [supplies from your company].  
CI1: Or if you have somebody that does that for you maybe you have some cash and you have somebody that gives you the check. I want to turn the money into my company, in my personal company. I have a personal

company, like I have another company so I want to put the money cash into my company. I'm only asking cuz one time you asked me.

Antle: I had a quick deal too. I had to get a monkey but the people won't take a check. They only take cash. So what do you do? You have to be able to get the cash to go do it, and it's hard to do.

CI1: [Myrtle Beach Launderer] done it for me a couple times, but he can only do so much, you know?

Antle: Yeah, of course it gets tight. And you are trying to do it with regularity?

CI1: I'm trying to do it quick.

Antle: Yeah, Yeah, exactly. But roughly, I probably don't need 300k right now. But maybe I got to check with the stuff. I mean I know, the nice thing would be then I can write the check.

CI1: To the company.

Antle: To the company or to you personally? It can go to the company.

CI1: No, to the company.

Antle: It goes to the company. So then it looks good like I'm buying lots more [supplies from your company] and so it's also tax deductible at the same time.

CI1: Yeah, that's what I did with [Myrtle Beach Launderer].

Antle: Yeah, cuz he can put it into the company. You can give cash to the subs or something.

CI1: He gives me a check like he is spending to do some work for him. Same thing.

Antle: Yeah, exactly, same thing.

CI1: Sorry, if I got to ask you this. But maybe you know somebody or you can help me out with that. We can help each other.

Antle: It's got to be the right option.

CI: That why I didn't want to talk on the phone, you know.

Antle: No, of course not, never. No text. Text is the worse. Now, when I got in trouble before is because they walked up and said we think you're being a bad guy. Let me see your phone. And they took my phone.

CI: Yeah.

Antle: Yeah and they have your phone. And they download your phone and they have your text. That's why text is the most dangerous. Because to tap your telephone, to listen to your phone calls is very difficult. That's a very very difficult umm...

CI: I still didn't want to tell you on the phone.

Antle: No, you shouldn't. But I'm just saying, it's never as dangerous but text is fucking easy for them to take from you. They can't take your phone calls because they are not recorded. And for them to get a warrant to listen to your phone is almost impossible. It's just not done in America very much. They just don't listen to phones.

CI: Ohhh Ok

Antle: You got to be a major drug dealer or a terrorist they are going to fuck you. If you are a terrorist they are going to listen to your phone somehow then all the rules are off if you are Al Queda.

Antle: If I got a friend that will do it... You got 600k right now that you want to swap?

CI: Yeah, I got 350 now and I'll have about 300 later.

Antle: So, 650 almost. That guy does deals for business. If he wants to take that from you and give you money for it, you gonna give him something for it? If there is any way if he says I'll take it but I want 10%? I want 20%? What is reasonable?

CI: Oh yeah, of course.

Antle: I know he is going to ask. If I ask him, he is going to ask.

CI: What do you think is reasonable? Like 5%?

Antle: I know guys previously that were doing stuff like that where they are helping guys that are having to sell oranges. Guys that are in the massive orange market. And they got tons of guys working for the orange market that they have to pay in cash. And they have to hide the cash because you'll get investigated for how many employees you have and how many people are there. So when they want to pay everyone in cash they want to switch it back. Those guys were paying 25% to exchange cash for checks to have enough cash to pay people. That's the last guys I know that were doing that. That's a lot of money. That's a couple hundred grand. That's a million dollars.

CI: Yeah, when I came to ask you that, of course I know there's gonna be something. When I do it with [Myrtle Beach Launderer], he charges me I think it's 7%. So of course, I don't want the guy to give a 600 thousand check and I give him 600,000, he needs to make some money. That's the business.

Antle: Right, Right. Of course, cuz he's a pro at it too. That guy. The Orange....

CI: Yes, that's the business. Everybody has to make something. I'm making having the cash so he needs to make something.

Antle: Of course. So what do you want me to tell him?

CI: Between 10 and 7. I mean between 5 – 7 %. And see what he says.

Antle: 5 and 7. Something like that? I can ask him. I can just see. You never know. And he'll do it, it won't be a problem.

23. On approximately December 17, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle at the Myrtle Beach Safari located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. In the recorded conversation, CI1 informed Antle the cash to be washed is derivative of smuggling and harboring illegal immigrants into the United States. CI1 and Antle also discussed how to execute money laundering transactions. The following is a transcription of a segment of the recorded conversation:

CI1: I have 250,000 dollar cash now  
Antle: 250,000 in cash, you got a chunk of it.  
CI1: Yeah  
Antle: Umm, I talked to the one girl and she didn't call me back yet. I got call her up. She won't be in til later, probably til 7. So a few more hours and let me see what the heck the story is with that shit. There's times when I am just desperate for it, you know  
CI1: Yeah, yeah, I'll have more. And just to let you know, [Myrtle Beach Launderer] can vouch for me. I've been doing it with [Myrtle Beach Launderer] but I don't think he can do that big.  
Antle: Yeah, it's a lot  
CI1: It's not drug money. I bring people in. Illegal people, to help work.  
Antle: You said something to me about it - Guys that are coming into the county that you have to, you got to keep it all cash  
CI1: Yeah. By Tuesday I'll have 250 cash. And I'll say in another week or two I'll have another  
Antle: You need a system. A friend of mine had a couple great systems. You run any other investments stuff? You run any investment properties or anything?  
CI1: I do properties, yeah, I do construction.  
Antle: Do you do rents or anything?  
CI1: Yeah I do  
Antle: I know one guy was friends with me for a long time that always had extra cash. He did fabulous with it at a laundromat.  
CI1: Mmm  
Antle: You know? You must have used it when you're a kid maybe sometimes. A fucking laundromat.  
CI1: Yeah  
Antle: You can say, more more more is coming in than I thought. Boom Boom Boom Boom. Of course the other one is hotel  
CI1: Hotel.  
Antle: Somebody here with a hotel. But I mean it's got to be that perfect guy. Of course, you can't even talk to somebody you don't have the connection with.  
CI1: And the thing is, I got all this cash and I have more coming. How am I going to spend all this? So that's why.  
Antle: Ohh easy. You need it to go into the bank to be investment money. It needs to just be.  
CI1: Yeah. I lost a deal last week cuz it was a cash deal but I can't just give him the cash  
Antle: Only a few things can you give just cash for.  
CI1: Yeah.  
Antle: Cars, sometimes. Really expensive cars, sometimes people will take cash for. Rolls Royce's or something you know.  
CI1: Something like that.

Antle: Something like that. Someone will take it, then you have to try and resell it. But it's not like... The best thing is business X makes 10 dollars a day normally. And you change it so that business X makes 40 dollars a day.

CI1: Yeah, yeah.

Antle: Right? That's the way to make it happen. So then that money, and a laundromat is all cash. So then everyday you deposit it in the bank the laundromat money. Every day you walk in and say here it is, here it is.

CI1: Here it is.

Antle: And you keep putting in that deposit and you can go up a thousand dollars a day. But even if it's a thousand dollars a day, you got too many days. That's 500 days. Fuck that, that ain't enough. So you need something better than that.

CI1: I know...

Antle: I know there's ways they do it in the produce business

24. On approximately December 19, 2021, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle at the Myrtle Beach Safari located at 851 Folly Ranch Lane, Myrtle Beach, South Carolina 29488. In the recorded conversation, Antle advised his friend will engage in money laundering with CI1 with a washing fee of 20%. Antle advised he will still be involved in the transaction as a third party. The following is a transcription of a segment of the recorded conversation:

Antle: So my friend said, umm, she for sure right now would do 4 for 5. Right? she will give you a check for 400k for 500 cash. She wants 20%. That's a high mark.

CI1: Ok, Damn.

Antle: But she told me no problem for that, she will give you a check right now for 400k for 500 cash.

CI1: Damn, that's 20%.

Antle: I know, I know, it's not easy. She says everybody brokering right now is paying 15. That's what she thinks. That everybody brokers cash pays 15. And she says some of the people that obviously some of the cash maybe got a little ink on it, maybe that stole it from a bank, she says a lot of that is 30-40%. But you know, that's what she is saying.

CI1: Can she not negotiate it?

Antle: I can tell her 15, I think she's gonna fuck around. She might do 15 but I don't think so. I think she does this shit all the time you know.

CI1: Yeah.

Antle: She says the market is saturated right now.

CI1: Yeah.

Antle: I don't know if it is true or not. Everybody always lies. When you start talking to people and they are telling you a part of this truth, you can't get the whole story because it's not my mama. You know?

CI1: Yeah.

Antle: Even my mom I don't get the whole story from anymore.

CI1: Yeah, that's a lot. 20% that's a lot.

Antle: That's a lot.

CI1: Ok, then I mean, is that something...you trust her?

Antle: Like 100%. It will be a check from me... No, I'll do it. I'll write you the check. I will get the other money back to her. She will cover me because she does other stuff with me for years. I'll give you a company check from us now that you can have and I just got to drive to Florida and get her the money in Florida cuz this is also somebody that works in the orange exchange. She says there's way if it is on a regular schedule there is a way to do it through the orange market because it's a traded commodity of the rise and fall of oranges. You buy this many oranges, you sell this many oranges and the difference in there you can do it with cash.

CI1: You can do with cash.

Antle: I don't know, I never did it. It's not my business. I'm secondhand information. I don't want you to feel like I am telling you I'm an expert cuz I don't know shit. I just know that I talked with her before and got cash from her before.

CI1: No, man, it's fine. As long as it's like you said. As long as it comes from you because I trust you.

Antle: Because you don't have anything to lose. The only thing to lose if the money is counterfeit then they'll come kill me. It will be all over if the money is counterfeit. These motherfuckers, something explosive would happen.

CI1: Yeah

Antle: I know it happened before. Somebody's done them and done counterfeit money. And it wasn't even all the money, but part of the money is counterfeit. I believe everybody got killed that did the counterfeit deals. No Bueno. No fucking good. Counterfeit is another crime.

25. Due to Antle's willingness to engage in money laundering activities in furtherance of violations of 8 U.S.C. § 1324, Bringing in and Harboring Certain Aliens, a qualified Specified Unlawful Activity (SUA), Special Agents of the FBI initiated a reverse money laundering operation in early February 2022. The reverse money laundering operation was as follows:

- a. Special Agents of the FBI established a covert business name and bank account in the name of said business. This was a business entity by name only and offered no employees, storefront, goods and/or services.
- b. Utilizing funds supplied by the FBI, an operation was established in which CI1 would provide cash to Antle and/or Sawyer to launder monies for the said SUA.
- c. In controlled operations that included consensual recordings and surveillances by Special Agents of the FBI, CI1 routinely met with Antle and Sawyer and hand delivered cash to them on three separate occasions.
- d. Prior to and after each operation, Special Agents searched CI1 and his vehicle for cash in order to maintain the integrity of funds provided. In addition, Special Agents maintained a direct line of sight of CI1 while traveling to/from meetings with Antle and Sawyer.
- e. On the same day the cash was provided to Antle and Sawyer, Antle and Sawyer, provided CI1 with a check made payable to the previously established business, a business entity Antle and Sawyer attributed to CI1.
- f. For the first two transactions, cashier's checks drawn from Anderson Brothers Bank with remitter of the checks listed as Andrew Sawyer were provided to CI1. The remitter of the third check was listed as South Carolina Conservation Farm LLC DBA Myrtle Beach Safari account held at Bank of America.
- g. After receipt of the check(s) from Antle and Sawyer, CI1 would provide the checks to Special Agents of the FBI, who deposited the checks into a bank

account in the name of the previously established business. The funds received in check form were approximately 15% less than the monies provided, 15% being the negotiated washing fee between CI1, Antle and Sawyer.

- h. Between early February 2022 to present, three separate cash transactions, more particularly described below, from CI1 to Antle and Sawyer totaling \$505,000 have been executed.<sup>1</sup>

26. Sawyer is an employee of the Myrtle Beach Safari and a resident of Myrtle Beach, South Carolina. In conversation between CI1 and Antle in March 2022, Antle described Sawyer as extremely loyal. The following information is also known about Sawyer and his Anderson Brothers bank account:

- a. According to records provided by Anderson Brothers Bank via a grand jury subpoena, Andrew Sawyer is listed as the account holder and signature authority for Anderson Brothers Bank account number [REDACTED] 8546 in the name of Socastee Landscaping, LLC. Sawyer is listed as the owner of Socastee Landscaping, LLC.
- b. Socastee Landscaping, LLC is a South Carolina domestic Limited Liability Company registered agent in the name of Kristy Pruett, business address 3527 Queens Harbour Boulevard, Myrtle Beach, South Carolina.
- c. According to records obtained via open-source media, Pruett and Sawyer were formerly married. According to current South Carolina DMV records,

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<sup>1</sup> A similar reverse money laundering operation was established and executed by Special Agents of the FBI between June 2021 to present with Myrtle Beach Launderer.

Sawyer resides at 3527 Queens Harbour Boulevard, Myrtle Beach, South Carolina, the same address listed as the business address for Socastee Landscaping, LLC.

27. Special Agents of the FBI understand money laundering is the process by which a person or organization converts cash and/or assets gained through illicit activity into a form that can be used legitimately and openly. As such, it aims to conceal the origin of the criminal earnings, convert proceeds to a less suspicious form and create a legitimate explanation for the source of assets. A washing fee is a term used to describe the fee that is retained by the individual converting or laundering the funds.

28. On approximately February 8, 2022, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle and Sawyer at the Myrtle Beach Safari. In the recorded conversation with Antle, CI1 discussed the alien smuggling operation in detail. Antle agreed to wash the money for CI1 and negotiated a washing fee. The conversation also detailed how to conceal the transaction and move the cash through the Myrtle Beach Safari by inflating tourist numbers. Sawyer joins Antle and CI1 during the conversation. CI1 conducted a controlled delivery of \$270,000 cash to Antle and Sawyer as part of the reverse money laundering operation. Sawyer assisted in the transaction by obtaining a cashier's check from Anderson Brothers Bank. The following is a transcription of four segments of the recorded conversation:

CI1: How about... how about 35,000 for another 270?  
Antle: 35 for what?  
CI1: For the 270.  
Antle: Too cheap. 15 is cheap. C'mon you know it's cheap. You, you, you, you gotta be giving more than 15 away a lot of the time. The people that work. How much you pay the people to work? If some girl wants to work, how much does she want to get paid?  
CI1: What girl?

Antle: If you had somebody, some Brazilian that's here, how much you gonna pay them?

CI1: I don't know, like 10, 12 dollars an hour.

Antle: 10 bucks an hour or so.

CI1: Plus they have no papers you know.

Antle: Right. Right.

CI1: I even know, if the girls work construction or work at a Brazilian store some of them I mean, they need to work somewhere where they are going to get paid in cash, I mean even a check is no problem but they don't have social security.

Antle: Right. What if it's just what if it's just like four or five hours at a time?

CI1: They can work.

Antle: Do you know them? Do you know these people?

CI1: Some of these people, yes. Some of them yes.

Antle: What about for cleaning? What about for cleaning houses?

CI1: Let me tell you something, if you put the girls to clean right here, they will clean. They come to work. They want to work.

Antle: And you think they're thieves? You think they'll steal? They won't be going through all the drawers looking for tidbits.

CI1: Nah, nah, nah. They good people man.

Antle: No? You're pretty sure?

CI1: Yeah.

Antle: How many, how many people have come in? You done a hundred? 500?

CI1: I got people every- every 15 days I got like 8, 10 people.

Antle: Coming?

CI1: Coming.

Antle: And some of them just go off? Just go off and go try to find their own way?

CI1: Yeah, they paid me.

Antle: They already have plans.

CI1: Yeah they already have family, friends.

Antle: Some way to connect.

CI1: That's how I'm getting this money, you should come with me.

Antle: That's what you said. That you've got...that you've... that you.. And they're just coming- how do they come in? Are they coming with a boat? With a-

CI1: Nah, nah just across the border in Mexico. They fly to Cancun like they are tourists, then from Cancun they fly to um, what's the name of this city?

Antle: It's in Mexico?

CI1: Juarez, yeah. Juarez.

Antle: Juarez, yeah.

CI1: Juarez is right on the border.

Antle: Yep.

CI1: And there we have the guys that-

Antle: Walk 'em across.

CI1: Walk them across. They stay at like a, like a small hotel, somebody come like a Uber and get them to a house. It takes- It's a process. It takes a couple days.

Antle: And then they just make it to Myrtle Beach?

CI1: Yeah. Then I take them to Dallas, from Dallas I buy a ticket to Myrtle Beach or if they already have somebody-

Antle: Because they have ID.

CI1: Yeah they have the-

Antle: They have a Brazilian driver's license.

CI1: The passport.

Antle: They have a passport.

CI1: They can fly-

Antle: So once they're in they can fly, no one, no one scans their passport to check of their citizenship, none of that matters.

CI1: Nothing.

Antle: The only way they're going to get in trouble is if they, if they go someplace that does ICE Checks.

CI1: I used to bring them- I used to pay somebody to drive them here.

Antle: Yeah.

CI1: It's, it's even danger than flying cause if the police stop a car with like 5, 6 people that don't speak English...

Antle: They will check.

CI1: They will check.

Antle: Yeah. But the airport-

CI1: The airport. Buy the ticket online, they do the check-in. They just go, show the passport, they don't have to speak English.

Antle: Yup.

CI1: Show the passport, go inside the plane, bye.

Antle: Simple.

CI1: Very simple.

Antle: Mhm.

CI1: Making good money this way.

Antle: How do you- where's the- how do you make the money just by what? By just... they pay a flat fee to come?

CI1: Yeah.

Antle: But then how do you get any more money out of it?

CI1: No I mean I spend to bring them here I spend about 11,000.

Antle: Right.

CI1: They pay me 20 grand to get here.

Antle: And they have it with them when they come?

CI1: Yeah.

Antle: And they say here's your payment?

CI1: Yeah. They give me half there.

Antle: Right.

CI1: Some of them and then they give me the other half here. Some of them, uh, they scared to lose the money and they say "I'll give you everything

when I'm there" so then somebody that work with me in Brazil go- know where their family is and everything and say "okay uh [CI1's true name] here's the family, they have everything, he show me that they got the money, then he can go. Then when they get here, everything is safe, they give the money over from Brazil.

Antle: [talking on the phone]Yes ma'am. Okay um, are you still- how much time you got over there? Okay, okay I'll be there in a minute. I gotta go give a tiger some shots. Always something. Um and so you, you could have even more people come if you, if you just were-

CI1: If, if I got more money? I can help even more people come.

Antle: Because you have to put more money out.

CI1: Yeah because I have to put the money first.

Antle: Right you have to invest money in the process.

CI1: Yeah. From all this time, only one time the police got them, but when the police got them, like the Mexican, the Mexican police we don't worry about. You give them 20 bucks, 50 bucks, they'll- I already, I already tell them it's 50 bucks in their pocket. If the Mexican police stop, that's why they wanna-

Antle: Right.

CI1: If the American police catch you, they only take you back to Mexico.

Antle: And you try again?

CI1: Yeah. Before, they used to deport people. And then you'd have to spend all the money again. Now they just send you back.

Antle: Right. So much easier. Yup. Almost all Brazilian people?

CI1: All Brazilian people, or Guatemalan, anybody.

Antle: You do everybody? You don't just do Brazilians?

CI1: No not only Brazil. But more, the Guatemalans, they pay me up front cuz I don't know them. Brazilian people, more of them are from my hometown, because uh, we know each other and all.

Antle: And they just wanting, they want to move to the States because better jobs?

CI1: Better jobs, opportunity. People that wanna come here-

CI1: So there's a check and write it to me.

Antle: Write a check for 229,500.

CI1: Yeah.

Antle: And you give me 270.

CI1: Yeah.

Antle: It's not the best deal.

CI1: It is the best deal.

Antle: It's not the best deal.

CI1: You're getting 40,000 dollars, right.

Antle: Yeah, I'm getting cash.

CI1: And you're gonna get more soon.

Antle: It's got its own whole thing. I I got it if if we have a schedule it's much more possible that I could I could more potentially do something with

the tourists possibly overbooking the tourists. You know I can just say I had this many tourists come today and and make and start making deposits for, for extra tourists and if I did that then we could over the amount of you know 100 times we say 4,000 dollars uh 100 times and we could we could quickly get to whatever the hell, 4 million dollars.

CI1: Yeah.

Antle: I could get a lot bigger if we if that was the purpose. We just have to make we just have to make it make sense. How, how what what's the maximum that you think is that you that you want to try to move? A million dollars, 2 million dollars?

CI1: Not more than that, I want to stop.

Antle: But how in in the 6 months' time March, April, May, June, July, August, September August. Those 6 months how much money would you would you want to do in those 6 months?

CI1: Less than about 250 each month.

Antle: 250 a month?

CI1: Yeah, I think.

Antle: Yeah.

CI1: It's just like a drug, you can't stop.

Antle: But it would be such a drag to be healthy and young and go do time.

Antle: My guy that lives here, that does all the stuff for me, Omar, who's been helping me for years and years. He has my other landscape company. He manages that. He is going to write me the check and he'll help you do it. He's not an in-between guy, he's a good fucking, stable guy. He he's he's always scared it's gonna be counterfeit cause he got fucked on counterfeit a couple times and he's tried... and I think he's tried the counterfeit market before. It's fucked up. Counterfeit's way too watched. Just one word of counterfeit and they will come on you like a fucking steamroller.

CI1: Yeah, I know.

Antle: Immigration is a tidbit, fucking counterfeit. Every, every federal agency in the world will chase you down for one counterfeit dollar they're fucking crazy. Millions? Danger danger.

CI1: Alright.

Antle: 229 5.

CI1: Yeah.

Antle: We'll be, I'll be right back

CI1: Okay.

Antle: We'll just go inside. Just bring the backpack and the machine we'll come inside. And he can help us do it.

CI1: Uhh question I forgot to ask you this. What are you going to put on your book, so I, so we don't cross.

Antle: We're going to write you the check for the 229 and were just going to say its's for construction. Construction.

CI1: Ok, I was just going to say when my accountant asks, I'll do the same thing.

Antle: Rock and construction. All the stuff we've been doing, just as though it was bigger.

Antle: You didn't do it as the um company? Landscaping?

Sawyer: I don't why they didn't do it. It should've been my company, Socastee landscaping.

Antle: I mean, maybe you didn't demand it. It doesn't matter.

CI1: No, it don't matter.

Antle: Did you fill out a 'what for' form on it at all?

Sawyer: No cause look at it, Socastee Landscaping. You know it.

Antle: I know that's what I am wondering. And you didn't put a 'what for' on it? There's not even a place for it?

Sawyer: There is a place but..

CI1: You can write something there if you want.

Sawyer: No I don't care.

Antle: You don't care? You don't want to say it's for construction or something?

Sawyer: You could unless I write it off, right?

Antle: I mean have a copy of it you can just take a picture of the check cause it should get written off he cause it should get written off cause he's just gonna have it be a business expense.

CI1: Yeah.

Sawyer: So should we write construction? I can't write it now.

Antle: I mean you can, you can write um final construction, write it across there. It's a choke.

Sawyer: Yeah, we can do that.

Antle: Might as well. I just wrote it for final construction um...

29. During the February 8, 2022, meeting between CI1, Antle, and Sawyer, Sawyer left in a vehicle and went to Anderson Brothers Bank to obtain a cashier's check. The following information is known about the February 8, 2022 transaction:

- a. Sawyer visited the Anderson Brothers Bank located at 2711 Agnes Lane, Myrtle Beach, South Carolina 29577, to obtain the cashier's check in the amount of \$229,500. According to records provided by Anderson Brothers Bank, the above-mentioned cashier's check was paid for using funds from Anderson Brothers Bank account number [REDACTED] 8546 (hereinafter referred

to as the “**Anderson Brothers’ Account**”) in the name of Socastee landscaping, LLC.

- b. When Sawyer returned to Myrtle Beach Safari, Antle and Sawyer provided the cashier’s check from Anderson Brothers Bank dated February 8, 2022 for \$229,500 made payable to the previously established business.
- c. The remitter of the cashier’s check was listed as Andrew Sawyer. The difference between \$270,000 and \$229,500 is \$40,500 or 15%. Antle and Sawyer retained a 15% washing fee.
- d. No goods or services were provided by CI1 or CI1’s companies/businesses in exchange for the funds enclosed in the check

30. On approximately March 24, 2022, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle and Sawyer at the Myrtle Beach Safari. In the recorded conversation, Antle inquired about a female illegal alien he believed CI1 is smuggling into the country to work at the Myrtle Beach Safari. CI1 discussed the alien smuggling operation in more detail with Antle and Sawyer. CI1 conducted a controlled delivery of \$115,000 cash to Antle and Sawyer as part of the reverse money laundering operation. Sawyer assisted in the transaction by obtaining a cashier’s check from the **Anderson Brothers’ Account**. The following is a transcription of two segments of the recorded conversation:

- CI1: I thought you were gonna do like 150 or something?
- Antle: That’s where the guy’s telling me we have about 200 grand total in the bank, thought we could throw out at least 150 but he just told us the capital gains is gonna come sooner and we have to have available money for capital gains.
- CI1: Okay.
- Antle: So, I am stuck at the moment. What’s happening with the girl?
- CI1: She’s supposed to fly on Tuesday.
- Antle: Tuesday from Brazil to Mexico?
- CI1: From Brazil to Mexico. And like I said.

Antle: Where does she go into Mexico? Does she fly like Mexico City or she flies to the north?

CI1: No, she fly to Cancun.

Antle: Cancun. That's what you said. Like vacation?

CI1: Yeah like vacation for two days and then she fly to... what's is called?... Juarez?

Antle: Juarez. Yeah, right there on the boarder.

CI1: Yeah, right there on the boarder and then they go in the tunnel.

Antle: At the tunnel they don't go through and say "hi, I'm here". They're not the ones like all those Mexicans that you see that are getting papers as they walk through.

CI1: No, no, no that's families, they do that with the kids. No just come by themselves so they have to be through

Antle: Through the tunnel

CI1: Through the tunnel and then

Antle: Through the tunnel and then she shows up

CI1: And then about an hour and a half, hour and 15 minutes stuck in the tunnel

Antle: Long time. Walking or driving?

CI1: No, it's a tunnel you gotta walk like that

Antle: You gotta walk like that to go. I remember at one point they said El Chapo had like trucks \*makes car noise\* driving full speed trucks.

CI1: Yeah this one is small.

Antle: Yeah.

CI1: So they go like hour, hour and 15 minutes. They don't run but they go fast for hour and 15 minutes. Then they stay there and wait until the guy comes and gets them, put them in a hotel. They stay there, you know.

Antle: Yep. And then she'll fly out.

CI1: And then she'll fly out.

Antle: So you still think maybe the end of the month?

CI1: Maybe end of the month, yeah.

Antle: First couple days of April?

CI1: If nothing goes wrong then yeah.

Antle: Yeah. Most of the time it's simple?

CI1: Most times its good, yeah. Most of the time its goes better. Lemme know if you wanna do it man or if you change your mind.

Antle: [Talking about Mario Tabraue story]...He did 12 years of 100

CI1: Wow

Antle: And he's free. Just connections. Money. Connections. Connections a lot of it was the CIA. The CIA connections.

CI1: Probably the guy that moved was scared to get killed.

Antle: Ohh, everybody. Everybody's a little bit, the whole thing is a bunch of real mafiosa's, South American fucking killers. I mean you gotta worry about that a little bit with just the breath of cartel breathing on your

people and doing stuff. Somebody knows who you are and where you are and what you're doing. I would always be a little paranoid.

CI1: Yeah, I mean where the people go it is the same.

Antle: I mean somewhere there's just cartel information. I always hear... you never fucking know. Hopefully they're so sophisticated they don't give a fuck about any little guys. They don't have shit to do with little guys.

CI1: They don't give a fuck about any of that.

Antle: This is Omar coming and saying "wait a minute, maybe I have some money" \*laughs\*. He doesn't know it's us. [Sawyer walks up]. It's just me. It's just me, if you're paranoid of who it was. You know who it is. Change your mind? So, yeah.

Sawyer: I could probably do 100 real quick. I could probably do 80 in a few weeks. I don't know.

Antle: You wanna do 100 on the spot?

CI1: Right now?

Antle: Yeah.

CI1: Yeah, I'll do 100.

Antle: He'd have to go to the bank and get a cashier's check cause you can't write a check you have to go get a check.

Sawyer: We can do it another day.

Antle: Do you want to wait a few minutes and send him to the bank?

CI1: Yeah, I'll wait a few minutes.

Antle: He says he'll wait. If you wanna leave you can just drive over. What's the name that you want?

CI1: [Says name of the previously established company.]

Antle: [Confirms name of the previously established company.]

CI1: [Says name of the previously established company], yeah.

Antle: [Says name of the previously established company] like you did last time. Do you need me to? Yeah, we'll back up.

31. During the March 24, 2022, meeting at Myrtle Beach Safari between CI1, Antle, and Sawyer, Sawyer left in a vehicle and went to Anderson Brothers Bank to obtain a cashier's check. The following information is known about the March 24, 2022 transaction:

- a. When Sawyer returned, Antle and Sawyer provided a cashier's check from Anderson Brothers Bank dated March 24, 2022 for \$100,000 made payable to the previously established business.

- b. The remitter on the cashier's check was listed as Andrew Sawyer. The difference between \$115,000 and \$100,000 is \$15,000 or approximately 15%. Antle and Sawyer retained an approximately 15% washing fee.
- c. The cashier's check was paid for using funds from the **Anderson Brothers' Account**.
- d. No goods or services were provided by CI1 or CI1's companies/businesses in exchange for the funds enclosed in the check.

32. On approximately April 26, 2022, at the direction of Special Agents of the FBI, CI1 utilized an audio/video recording device to record an in-person meeting with Antle and Sawyer at the Myrtle Beach Safari. In the recorded conversation, Antle inquired about a female he believes CI1 is smuggling into the country to work at the Myrtle Beach Safari. CI1 also discussed the alien smuggling operation in more detail with Antle and Sawyer. CI1 conducted a controlled delivery of \$120,000 cash to Antle and Sawyer as part of the reverse money laundering operation. The following is a transcription of a segment of the recorded conversation:

CI1: My man!  
Antle: Nobody in the backseat?  
CI1: Never.  
Antle: Where's she at?  
CI1: She's in Mexico. She's there already.  
Antle: On the border still? Or not quite make it to the border yet?  
CI1: No, she didn't make it to the border yet. It's kind of hot there right now, you know.  
Antle: Yeah? I thought it was like... not temperature hot? You mean like..  
CI1: No no. like yeah.  
Antle: Oh cause the news says "Oh! it's a free for all, who cares".  
CI1: Nah bullshit.  
Antle: Bullshit of course.  
CI1: She's just waiting a little bit.  
Antle: Yeah?  
CI1: I may just go there. Sometime.  
Antle: You go there?

CI1: Yeah. Next week.  
Antle: She must be really cute.  
CI1: She is.  
Antle: That's why you're going there. I can tell (laughter).  
CI1: She's not my girlfriend.  
Antle: No, not yet.  
CI1: Not now. She won't be. I am married.  
Sawyer: Yeah, so am I. Eight times (laughter).  
CI1: You gotta have the place to play, I don't.  
Antle: (laughter)  
CI1: Yeah.  
Sawyer: I was telling him I am trying to hook him up with my friend that does the containers.  
Antle: And what about em? you ready for containers?  
CI1: Mmhmm  
Sawyer: Yeah, my friend can do it for eleven. He is paying 12.5, 13.  
CI1: Yeah.  
Sawyer: Sounds good, saves me.. doing 13 containers a month, that's 20 grand. 200 grand a year. He throws us 100, all good.  
Antle: You ready?  
CI1: I'm ready.  
Antle: So cash wise, I need to spend some cash again, so, I am gonna, you wanna do? You got cash with you?  
CI1: Yeah, right here I have 120.  
Antle: 120..um 120 for 100?  
CI1: For 102.  
Antle: For 102? Is that what it goes to? 102?  
CI1: 100,000. 102,000. + 15% yeah.  
Antle: Ahh okay.  
CI1: And that's it? You can't give me to 110?  
Antle: What?  
CI1: I said, you can't give me 110?  
Antle: (laughter)  
CI1: You make more money, making more money. I look it up online because I want to bring my son.  
Antle: Yeah.  
CI1: And now you, you raise almost 200\$  
Antle: Well.  
Sawyer: It's a sliding scale  
CI1: Is that why... is that so you can clean the cash?  
Antle: The first person who comes is 339. The first 20 people: 339.  
CI1: Ohh  
Antle: From 20-30: 339. From 30-40: 439. From 40-50: 589. From 50 up: 689.  
Sawyer: So you have to look at tours where no one is booked.

Antle: Ah but you just let me know. You can pay whatever you fucking want.  
CI1: No, yeah I know. I just look it up. Like damn he raised the price so he can...  
Antle: That's the only way I can afford you.  
CI1: No, I thought it's just it's just so I can show the, what you are doing with the cash.  
Antle: No, I can do that. But that takes a big plan.  
CI1: I know.

33. On April 26, 2022, Antle and Sawyer provided CI1 with a check from a Bank of America account with remitter listed as South Carolina Conservation Farm LLC DBA Myrtle Beach Safari account number [REDACTED] 6422 dated April 26, 2022 a/k/a **6422 Account** for \$102,000 made payable to the previously established business. Antle and Sawyer retained a 15% (approximate) washing fee. No goods or services were provided by CI1 or CI1's companies/businesses in exchange for the funds enclosed in the check.

34. On April 26, 2022, approximately 30 minutes after the execution of the above-mentioned recording, CI1 recorded a telephone conversation with Antle. CI1 telephonically contacted Antle at his phone number referenced above. In the recorded conversation, Antle tells CI1 to put "ape house" or supplies form his business on his books to disguise the check payment for goods/services. The following is a transcription of a segment of the conversation:

Antle: Yes sir.  
CI1: Hey, just a question. You put on the check 'Ape House', 'Ape House'. What do you want me to put on my books so it can match?  
Antle: Yeah, you can just put 'ape house', you can just put '... bathroom' like we're doing it for the green bathroom, the rainforest.  
CI1: Ok.  
Antle: I just had to put something so I said Ohh, We'll just do that because that's where we used [your company's supplies] before in the ape house.

35. From approximately February 8, 2022 to June 1, 2022, the reverse money laundering scheme was operated by Special Agents of the FBI. The following is a breakdown of each transaction in which cash was provided to Antle and Sawyer and checks were written by

Antle and/or Sawyer from either the **Anderson Brothers' Account** or the **6422 Account** and made payable to CI1's business:

**\$270,000 cash payment to Antle and Sawyer by CI1 on 2/8/2022**

\$229,500 check received by CI1 on 2/8/2022 from the **Anderson Brothers' Account**

Total returned = \$229,500

Antle and Sawyer retained a 15% (approximate) washing fee

**\$115,000 cash payment to Antle and Sawyer by CI1 on 3/24/2022**

\$100,000 check received by CI1 on 3/24/2022 from the **Anderson Brothers' Account**

Total returned = \$100,000

Antle and Sawyer retained a 15% (approximate) washing fee

**\$120,000 cash payment to Antle and Sawyer by CI1 on 4/26/2022**

\$102,000 check received by CI1 on 4/26/2022 from the **6422 account**

Total returned = \$102,000

Antle and Sawyer retained a 15% (approximate) washing fee during each transaction.

36. The total amount of money received by Antle and Sawyer for money laundering services as of the date of this Affidavit is \$505,000. The total amount of money returned via check(s) to CI1 by Antle and/or Sawyer as of June 1, 2022 is \$431,500.

37. On June 1, 2022, arrest warrants were issued in the United States District Court for the District of South Carolina for Antle and Sawyer. The arrest warrants were signed by United States Magistrate Judge Thomas E. Rogers.

38. Also on June 1, 2022, a seizure warrant was issued in the United States District Court for the District of South Carolina for the **6422 Account**. The seizure warrant was signed by United States Magistrate Judge Thomas E. Rogers.

39. On June 3, 2022, at approximately 12 pm, Bank of America was served with the above-mentioned seizure warrant for the **6422 Account** by Special Agents of the FBI. Upon information and belief, based on discussions with Bank of America and its representatives, the end of day balance on June 3, 2022 was \$739,344.13.

40. On June 3, 2022, at approximately 1:45 p.m., Antle and Sawyer were arrested by Special Agents of the FBI. After their arrest, Antle and Sawyer were transported separately to the FBI Myrtle Beach Resident Agency of the FBI for processing and interviewing.

41. At approximately 4:30 p.m. on June 3, 2022, Antle was made aware of the seizure warrant for the **6422 Account**.

42. After their processing and interviewing, Antle and Sawyer were then transported to the J. Rueben Long Detention Center. From June 3, 2022 to present, Antle and Sawyer have been held within the J. Rueben Long Detention Center.

43. On June 10, 2022, Special Agents of the FBI were informed by a representative of Bank of America that no funds were available for seizure from the **6422 Account**. The Bank of America representative advised a hold was not placed onto the **6422 Account** by Bank of America until June 8, 2022. Until a hold was in place, customers and/or signature authorities had full access to the account.

44. Between June 6, 2022 and June 8, 2022, funds from the **6422 Account** were disbursed to the **Subject Accounts** listed in paragraphs 4(b) – 4(f).

45. A grand jury subpoena was submitted to the representative of Bank of America on June 10, 2022, for the **Subject Accounts**. The following transactions were executed from the **6422 Account** between June 6, 2022 and June 8, 2022.

- a. On June 6, 2022, an online banking transfer of \$500 was executed from the **6422 Account** to the **6435 Account**.
- b. On June 6, 2022, an online banking transfer of \$100,000 was executed from the **6422 Account** to the **6435 Account**.

- c. On June 6, 2022, an online banking transfer of \$150,000 was executed from the **6422 Account** to the **6435 Account**.
- d. On June 6, 2022, an online banking transfer of \$100,000 was executed from the **6422 Account** to the **6435 Account**.
- e. On June 8, 2022, an online banking transfer of \$1,000 was executed from the **6422 Account** to the **6435 Account**.
- f. On June 6, 2022, an online banking transfer of \$50,000 was executed from the **6422 Account** to the **1205 Account**.
- g. On June 6, 2022, an online banking transfer of \$75,000 was executed from the **6422 Account** to the **1205 Account**.
- h. On June 6, 2022, an online banking transfer of \$50,000 was executed from the **6422 Account** to the **1205 Account**.
- i. On June 8, 2022, an online banking transfer of \$7,000 was executed from the **6422 Account** to the **1205 Account**.
- j. On June 8, 2022, an online banking transfer of \$3,000 was executed from the **6422 Account** to the **1205 Account**.
- k. On June 6, 2022, an online banking transfer of \$40,000 was executed from the **6422 Account** to the **5409 Account**.
- l. On June 6, 2022, an online banking transfer of \$25,000 was executed from the **6422 Account** to the **9802 Account**.
- m. On June 7, 2022, an online banking transfer of \$36,480.37 was executed from the **6422 Account** to the **8371 Account**.

n. On June 7, 2022, a wire in the amount of \$100,000 was sent from the **6422 Account** to the IOLTA account for Ryan Beasley.

46. Based on additional records received from Bank of America, Antle has an additional account ending in **6132**, which is described in paragraph 4(g), and has funds in it that are currently frozen.

47. On June 8, 2022, a negative \$965.03 balance existed for the **6422 Account**.

48. Antle and/or persons with signature authorities on the **Subject Accounts** moved traceable proceeds of criminal activity, property that was involved in money laundering transactions, and violations of the statute described herein to the other identified **Subject Accounts**. Based on this activity, the Government was unable to seize the \$739,344.13 it had a valid warrant for.

49. Bank of America, as part of its own investigation, has frozen the assets that currently exist in the **Subject Accounts**.

50. As set forth in paragraph 4(b) of this affidavit, the **1205 Account** is in the name of Rajani Tigers Ferrante DBA Preservations Station Preserve and Antle has signature authority. As further set forth in paragraphs 45(f) – (j), \$185,000 was transferred from the **6422 Account** to the **1205 Account**. The Government will limit its seizure of funds from the **1205 Account** to \$185,000.

### CONCLUSION

51. I submit this affidavit supports probable cause for a seizure warrant to be executed on the **Subject Accounts**, thoroughly showing that funds contained within the account were involved in a transaction or derived from proceeds traceable to violations of Title 18 U.S.C. §

1956(a)(3) (Laundering of Monetary Instruments) and Title 18 U.S.C. § 1956(h) (Money Laundering Conspiracy).

52. In addition, there is probable cause to believe that the account funds are subject to seizure and criminal forfeiture to the United States pursuant to Title 18 United States Code Section 982 and Title 21 United States Code Section 853(f), because the funds would, in the event of conviction on the alleged underlying offense, be subject to forfeiture; and an order under Title 21 United States Code Section 853(e) would not be sufficient to assure the availability of the property for forfeiture.

53. Under Title 18 United States Code Section 984, for any forfeiture action in rem in which the subject property consists of cash, monetary instruments in bearer form, or funds deposited in an account in a financial institution:

- a. The government need not identify the specific funds involved in the offense that serves as the basis for the forfeiture;
- b. It is no defense that the funds have been removed and replaced by other funds; and
- c. Identical funds found in the same account as those involved in the offense serving as the basis for the forfeiture are subject to forfeiture.

54. Assistant United States Attorneys Derek Shoemake and Amy Bower have reviewed this affidavit.

Respectfully submitted,

  
Joseph Hamski  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on June 15, 2022

  
The Honorable Thomas E. Rogers, III  
United States Magistrate Judge